

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RILEY GAINES, *et al.*

Plaintiffs,

V.

Case No. 1:24-cv-01109-MHC

NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION, *et al.*

Defendants.

MOTION FOR LEAVE TO PROCEED UNDER PSEUDONYMS

Plaintiffs Swimmer A and Track Athlete A (collectively, “Doe Plaintiffs”), by and through the undersigned counsel, respectfully seek leave to proceed under pseudonyms in this action to protect their identities from public disclosure while they pursue this lawsuit. This motion is supported by Plaintiffs’ Brief in Support of Motion for Leave to Proceed Under Pseudonyms.

In this action, the Doe Plaintiffs, along with several other named individual plaintiffs, file this action involving violations of Title IX and the Fourteenth Amendment Equal Protection Clause by the defendants. The Doe Plaintiffs request anonymity on several independent grounds. If the Doe Plaintiffs' identities and participation in the lawsuit were to become public, there would be an increased risk of retaliation and severe repercussions to the Doe Plaintiffs.

This case turns on legal questions and issues related to the advantages of biologically male athletes competing in female sports, not on the identities of any particular individual plaintiff. Thus, the public's interest in open judicial proceedings will not be affected if the Doe Plaintiffs are permitted to proceed anonymously.

Defendants will not suffer any prejudice if the Doe Plaintiffs are permitted to proceed anonymously, because this case turns solely on legal questions.

Plaintiffs Swimmer A and Track Athlete A have a reasonable fear of harm if denied the opportunity to pursue this action without a pseudonym and their privacy interests far outweigh the public's interest in full disclosure. They request that this Court enter an order permitting them to proceed by pseudonym.

Date: June 18, 2024

Respectfully submitted,

/s/ William Bock III

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, counsel certifies that the foregoing was prepared in Times New Roman, 14-point font, in compliance with Local Rule 5.1C.

/s/ Bryan P. Tyson

Bryan P. Tyson

Georgia Bar No. 515411

ATTORNEY FOR PLAINTIFFS